

**IN THE UNITED STATES BANKRUPTCY COURT
OF THE MIDDLE DISTRICT OF PENNSYLVANIA**

IN RE:	:	
CHRISTOPHER J. CAVALIER,	:	
MARAGARET A. CAVALIER.	:	
Debtor,	:	Case No.: 1:18-bk-03303-HWV
	:	
	:	Chapter 13
	:	
	:	11 U.C.S. 362
DITECH FINANCIAL LLC,	:	
Movant,	:	
	:	
v.	:	
	:	
CHRISTOPHER J. CAVALIER.	:	
MARAGARET A. CAVALIER,	:	
Respondents,	:	
	:	
CHARLES J. DEHART, III	:	
Trustee	:	

**DEBTORS' ANSWER TO MOVANT'S MOTION FOR RELIEF FROM THE
AUTOMATIC STAY**

AND NOW COME, Debtors, Christopher J. Cavalier and Maragaret A. Cavalier, by and through their attorneys, Jacobson, Julius & Harshberger, and hereby file this Answer to Movant's Motion for Relief from the Automatic Stay and in support thereof states as follows:

1. Admitted.
2. Admitted.
3. Admitted.
4. Admitted.
5. Admitted.
6. Admitted in part and denied in part. It is admitted Debtors are behind to movant.

It is denied as to the amount of post-petition arrears. Debtors are hopeful that after a correct calculation that Movant will stipulate to or a allow a cure via an amended plan.

7. Admitted in part and denied in part. It is admitted Debtors are behind to movant. It is denied as to the amount of post-petition arrears. Debtors are hopeful that after a correct calculation that Movant will stipulate to or allow a cure via an amended plan.

8. Denied.

9. Denied.

10. Denied.

WHEREFORE, Debtor respectfully requests that this Honorable Court deny Movant's Motion for Relief from the Automatic Stay and further requests any other relief deemed necessary and just.

Respectfully Submitted,

JACOBSON, JULIUS & HARSHBERGER

Dated: July 9, 2019

s/Chad J. Julius
Chad J. Julius
ID# 209496
8150 Derry Street
Harrisburg, PA 17111.5260
717.909.5858

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CHARLES J. DEHART, III	:	
Trustee	:	

CERTIFICATE OF SERVICE

I, Colleen, paralegal with Jacobson, Julius & Harshberger, do hereby certify that on this day I served the within Respondent's Answer to Movant's Motion For Relief From The Automatic Stay upon the following persons via the ECF/CM system and/or by depositing a true and correct copy of the same in the United States Mail, first class, postage prepaid:

ECF/CM:

Charles J. Dehart III, Esquire (Trustee) 8125 Adams Drive, Suite A Hummelstown, PA 17036	James C. Warmbrodt, Esquire KML Law Group, P.C. 701 Market Street, Suite 5000 Philadelphia, PA 17106-1532
U.S. Trustee 228 Walnut Street, Suite A Harrisburg, PA 17101	

s/Colleen Reed
 Colleen Reed, Paralegal
 Jacobson, Julius & Harshberger
 8150 Derry Street
 Harrisburg, PA 17111
 717.909.5858
 Email: creed@ljacobsonlaw.com

Dated: July 9, 2019